

Message

From: Jamie Nease [jnease@hlpengineering.com]
Sent: 10/29/2018 2:59:42 PM
To: Marsh, Karen [Marsh.Karen@epa.gov]
Subject: OOOO/OOOOa Storage Tank Applicability

Karen-

Can you please direct me to the right person if you are not it?

If a storage tank is determined to be not applicable to OOOO/OOOOa since PTE is less than 6 TPY VOC considering enforceable limits in a permit, would applicability have to be reconsidered after upset conditions?

This is my specific scenario. I have a couple storage tanks at a facility that are controlled by a lit flare. The post-control emissions are made enforceable by a permit and as such the tanks are not subject to the rule since emissions are less than 6 TPY. If there is an upset with the flare, i.e. the flare goes out and tank emission are vented for a short period, should applicability be reassessed to include uncontrolled emissions during that downtime? Or is applicability to the rule made only once, during the 30-day period after start of production?

Thanks for any insight you can provide.

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